REMARKS

Applicant respectfully traverses and request reconsideration.

This is in response to a non-final Office Action mailed February 24, 2003. In the present Office Action, claims 2-11, 13, 14, 17-19, 21 and 22 currently stand rejected. Applicant respectfully traverses and requests reconsideration.

Claims 21 and 14 currently stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,657,046 (hereinafter referred to as "Noble"). Applicant respectfully traverses and submit that the rejection is no longer proper in view of amended claim 21 and moot in view of cancelled claim 14.

Applicant respectfully submits, for the Examiner's consideration, amended claim 21 including the limitation originally presented in claim 3 of "storing the at least a first portion of the active video in a video memory associated with a first VGA." It is respectfully submitted that this amendment is not narrowing in nature but rather a further delineation of inherently claimed features previously contained and claimed herein. Should the Examiner feel that this a narrowing amendment or directly related to patentability, Applicant respectfully requests a statement by the Examiner asserting this position.

As understood, Noble discloses a video message display system allowing for the transition of an image data to be displayed over a plurality of display monitors. In one embodiment, a preprogrammed sequencer graphics screen may be sequenced and controlled by a master computer to allow for the generation of multiple concurrent images on multiple screens to produce the image of the image data being scrolled across multiple screens. In essence, Noble teaches, *inter alia*, that there exists a plurality of self-contained image display modules providing for the display of one general overall image data.

The claimed present invention is directed towards, *inter alia*, rendering at least a first portion of a frame of video at a first video graphics adapter in response to a first control signal, then rendering at least a second portion of the first frame of video at a second video graphics adapter in response to a second control signal. It is respectfully submitted that the claimed present invention operates in a completely different manner and produces a completely different result. The claimed present invention operates by, *inter alia*, using a first and second video

graphics adapter to produce a visible graphical frame of active video which is displayed in response to the claimed control signal.

Among other differences, Noble fails to utilize a control signal for specifying the window location for displaying the active video and also, in one embodiment, generates the results having multiple active video frames which comprise the image data, as opposed to the claimed active video which is generated into a first portion and second portion and rendered in response to a first and second control signal.

Regardless thereof, it is submitted that Noble fails to teach or suggest all of the claimed limitations of claim 21 including, but not limited to, "storing the at least a first portion of the active video in a video memory associated with a first VGA." As such, Applicants respectfully requests reconsideration and withdrawal of the present rejection.

Applicant respectfully submits, for the Examiner's consideration, the cancellation of claim 14, without prejudice. Applicant respectfully traverse the Examiner's characterization of the teachings of Noble as applied to the present invention but respectfully submit, for the purpose of furthering the prosecution of the present application, on cancellation of claim 14. As such, it is submitted that the present rejection of claim 14 is thereby rendered moot and withdrawal is requested.

Claims 21 and 2-11 currently stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,956,046 (hereinafter referred to as "Kehlet"). Applicant respectfully traverses and requests reconsideration.

As understood, Kehlet is directed to, *inter alia*, a scene synchronization for multiple computer displays (20A-20C). Kehlet discloses, *inter alia*, a system having three separate and distinct graphics accelerators (40A-40C) which communicate via a drawing signal 102 for providing graphics outputs (30A-30C) to the video monitors (20A-20C). In the preferred embodiments, the graphics accelerators 40 receive a reference synchronization signal 110 to provide for synchronization therein. As disclosed in Kehlet, "the drawing signal 102 is used to communicate the collective state of each graphics accelerator 40 relative to an impeding scene switch." (*See*, col. 5, lines 32-34). Furthermore, FIG. 3 illustrates a graphics accelerator, such as one of any graphics accelerator 40A-40C. The graphics accelerator 40 receives pixel data from

the previous stages of the graphics pipeline which is provided to the frame buffer unit 210. Through the pixel multiplexor 220 and the DAC 230, the video signal 240 is generated, which is provided to the display device 20. As succinctly illustrated in FIG. 3 and the accompanying discussion on col. 5, line 39-col. 5, line53, each specific graphics accelerator is independently operated and independently produces video signal 240 from the display device 20 and provides interaction solely through the drawing signal 102. As discussed above, the drawing signal 102 allows for the indication of an impending scene switch, whereby all three separate video screens may be synchronized for a timely scene switch. Kehlet discloses a video graphics system having, *inter alia*, three separate and distinct graphics accelerators 40 interconnected through a drawing signal 102 for providing the synchronization of the operation of the separate graphics accelerator 40 with respect to video outputs 20. Kehlet discloses, *inter alia*, a single specific image for each display and does not disclose a combined view screen across all three images whereupon the multiple graphics accelerator would generate an overall image frame composed of three separate portions of the screen, but rather discloses, *inter alia*, separate video signals which are synchronized solely through the use of a field locking of the displays.

Regarding amended claim 21, Applicant respectfully submits that Kehlet fails to disclose all of the claimed limitations. On page 4 of the present Office Action, the Examiner asserts that Kehlet discloses "rendering at least a second portion of the first frame of video at a second VGA in response to a second control signal," as being disclosed by Element 228 of FIG. 3, the scene switch input bus providing a signal-to-switch video, to which Applicant respectfully traverses. The scene switch input bus 228 is further disclosed beginning on col. 5, line 56-col. 7, line 18, wherein Kehlet discloses that the scene switch input bus and reference signals from reference signal synchronization unit 10 is received by the DAC 230. Using the double buffering embodiment, including bank zero 202A and bank one 202B, two separate and distinct frames of video data may be stored in the frame buffer 210, one frame in each buffer. It is respectfully submitted that the storage of a second frame in the frame buffer memory bank one 202B is inconsistent with the claim limitation of rendering at least a second portion of the first frame of video at a second VGA in response to the second control signal.

Among other things, Kehlet fails to disclose rendering at least a second portion as it merely discloses the frame buffer memory bank one 202B containing new pixel data for the next scene.

Furthermore, it is respectfully submitted that the pixel data which may be stored in the bank 202A or 202B is not "a second portion of the first frame of video." Kehlet succinctly discloses having separate scenes composed of pixel data being stored in separate memory buffers and fails to disclose the scenes as being part of a single frame.

Moreover, it is contrary that the teachings of Kehlet to interpret a first scene and a second scene as being part of a first frame of video because, *inter alia*, Kehlet discloses uses the drawing signal 102 for the purpose of synchronizing between displaying the separate scenes on separate screens, which is inconsistent with separating a frame to be displayed on separate screens.

Furthermore, Applicant respectfully traverses the Examiner's assertion that the second portion of the first frame of video at a second VGA is rendered "in response to a second control signal." The above-noted passages and figures from Kehlet disclose the specific rendering of pixel data and providing for a video output signal 240 of pixel data on a per graphics accelerator 40 basis. Kehlet does not disclose multiple graphics accelerators interacting beyond the drawing signal 102 for synchronization. Therefore, Kehlet does not disclose the second portion of the first frame of video at a second VGA (such as 40B or 40C) in response to a second control signal because there is no direct rendering interaction between the graphics accelerator 40A-40C and there does not exist a single frame being split into a first and second portion spread across the different graphics accelerators 40A-40C. As such, Applicant respectfully submits that Kehlet operates in a completely different manner and produces a completely different result than the claimed present invention.

Applicant respectfully requests reconsideration and withdrawal and the passage of claim 21 to issuance. Should the Examiner maintain the present rejection, Applicant requests a showing, including column and line numbers, of each of the claimed limitations, specifically including, but not limited to, Kehlet disclosing the claimed limitation of "rendering at least a second portion of the first frame of video at a second VGA in response to a second control signal," more specifically the claimed first frame of active video being rendered into a first

portion and second portion, being rendered at a second VGA, and being rendered in response to the claimed second control signal.

Regarding claims 2 and 4-11, Applicant respectfully submits that these claims contain further limitations in view of the teachings of Kehlet, as discussed above operate in a completely different manner and produce a completely different result than the disclosure of Kehlet. As such, Applicant respectfully resubmits the above position offered with regards to claim 1 and submits that claims 2 and 4-11 contain further patentable subject matter and are allowable not merely as being dependent upon an allowable base claim. As such, Applicant respectfully request reconsideration and the passage of these claims to issuance.

More specifically, regarding claims 6 and 7, Applicant respectfully traverses the Examiner's assertion regarding the teachings of Kehlet as disclosing a direct memory access controller as being disclosed by the scene switch input bus. It is respectfully submitted that the scene switch input bus 228 is disclosed as receiving the scene switch input and does not disclose a direct memory access as claimed in the claimed present invention. Therefore, in the event the Examiner should maintain the present rejection, Applicant respectfully requests a showing, including column and line numbers of specifically wherein the scene switch input bus 228 specifically discloses the claimed direct memory access controller.

Claim 13 currently stand rejected under 35 U.S.C. §103(a) as being unpatentable of Kehlet in view of U.S. Patent No. 4,949,169 (hereinafter referred to as "Lumesky"). Applicant respectfully traverses and requests reconsideration. Applicant respectfully resubmits the above position offered with regards to claim 1 and submits that claim 13 contains further patentable subject matter in view thereof. Therefore, one of ordinary skill in the art would not have been motivated to combine these references because the combination thereof fails to produce the claimed present invention. As such, it is respectfully submitted that claim 13 is allowable, not merely as being dependent upon an allowable base claim. As such, reconsideration, withdrawal and the passage of claim 13 is respectfully requested.

Claims 22 and 17-19 currently stand rejected under 35 U.S.C. §103(a) as being unpatentable over Kehlet in view of U.S. Patent No. 5,523,769 (hereinafter referred to "Lauer"). Applicant respectfully traverses and requests reconsideration. Applicant respectfully resubmits

the above position offered with regards to claim 1, specifically regarding the teachings of Kehlet. Claim 22 recites, *inter alia*, "displaying at least a first portion of the first frame of video at a second VGA in response to a second control signal." As discussed above, it is respectfully submitted that Kehlet fails to disclose, *inter alia*, the claimed first frame of active video, wherein the first frame may be sub-divided into a first portion. More specifically, Kehlet discloses, *inter alia*, a first VGA having multiple buffers within a single frame buffer unit 210 for storing two separate and distinct frames of pixel data. An input to trigger a scene switch operation is received, such that a next scene within a bank 202A or 202B may be provided as video signal 240 in synchronization with the other graphics accelerators 40B and 40C. It is respectfully submitted that the multiple graphics accelerators 40 of Kehlet are synchronized with each other for providing synchronized output on separate displays, but do not specifically share video pixel data. As such, it is beyond the teachings of Kehlet to receive a first frame of active video at a first VGA and then display even a portion of the first frame of video at a second VGA, as Kehlet clearly discloses each graphics accelerator specifically generating separate and distinct, but synchronized, video signals 240. Therefore, it is respectfully submitted that one of ordinary skill in the art would not have been motivated to combine the teachings of Kehlet with the teachings of Lauer, as the combination thereof would fail to produce the claimed present invention. As the Examiner has asserted Lauer as disclosing multiple display systems for teaching or suggesting the video source being either a video decoder or a television signal. As such, the combination of the teachings of Kehlet with Lauer disclosing a video source, would fail to produce the claimed present invention. As such, Applicant respectfully requests reconsideration and withdrawal and the passage of claim 22 to issuance. In the event the Examiner should maintain the present rejection, Applicant respectfully requests a showing, including column and line numbers, of where Kehlet specifically discloses, *inter alia*, these scenes which input bus 228 providing for the display of at least a first portion of a first frame of video at a second VGA in response to a second control signal.

Regarding claims 17-19, Applicant respectfully resubmits the above position offered with regard to claim 22 and submits that claims 17-19 contain further patentable subject matter in view thereof. As such, it is respectfully submitted that claims 17-19 are allowable, not merely as

being dependent upon an allowable base claim. As such, Applicant respectfully requests reconsideration and withdrawal and the passage of claims 17-19 to issuance.

Accordingly, Applicant respectfully submits that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

Date: 5/20/03

By: _____
Timothy J. Bechen
Registration No. 48,126

VEDDER, PRICE, KAUFMAN &
KAMMHOLZ
222 N. LaSalle Street
Chicago, IL 60601
(312) 609-7870
FAX: (312) 609-5005